

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

MYNETTE TECHNOLOGIES, INC.)	
and STEVEN M. COLBY,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 16-cv-01647-RTH
THE UNITED STATES,)	
)	
Defendant,)	Judge Ryan T. Holte
)	
and)	
)	
GEMALTO, INC. and IDEMIA IDENTITY)	
& SECURITY USA LLC,)	
)	
Intervenor-Defendants.)	
)	

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiffs Mynette Technologies, Inc. and Steven M. Colby (collectively, “Mynette”), Defendant, the United States (“the Government”), and Intervenor-Defendants Gemalto, Inc. (“Gemalto”) and Idemia Identity and Security USA LLC (“Idemia”) (collectively, “the Parties”) respectfully submit this Joint Motion to Amend the dates in the current Scheduling Order, filed on October 3, 2024 (ECF No. 202).

Since the Court’s October 3, 2024 Scheduling Order, Plaintiffs and Defendants have exchanged responsive expert reports. In addition, Plaintiffs and the Government have been engaged in meaningful settlement discussions and considerable progress has been made towards a comprehensive settlement of this action. Specifically, Plaintiffs and the Government have

substantially narrowed their differences since the conclusion of the mediation proceedings in September.

Therefore, in an effort to avoid the expense of further litigation, preserve the Parties' and the Court's resources and maintain focus on the present settlement discussions, the Parties propose a forty-nine (49) day extension of the remaining scheduled deadlines to allow those settlement discussions to proceed unimpeded by the need to simultaneously prepare for and conduct the depositions of the parties' expert witnesses.

For the foregoing reasons, the parties respectfully request that the Court modify the dates in the October 3, 2024 Scheduling Order as follows:

Event	Current Date	Proposed Date
Close of expert discovery (for all issues other than damages), to include expert depositions	December 6, 2024	January 24, 2025
Deadline for dispositive motions under RCFC 56	January 10, 2025	February 28, 2025
Deadline for responses to dispositive motions	February 7, 2025	March 28, 2025
Deadline for replies to dispositive motions	February 21, 2025	April 11, 2025

The Parties have not previously sought or obtained a modification of the October 3, 2024 Scheduling Order and respectfully request the Court to modify the October 3, 2024 Scheduling Order (ECF No. 202) as proposed above.

Respectfully submitted,¹

December 6, 2024

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¹ Pursuant to RCFC 20(B) of Appendix E, the filing attorney represents that the other parties have reviewed this document and consent to its filing.